

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CURTIS CARTER,

ECF CASE

Plaintiff,

08 Civ. 3745 (RWS)

- against -

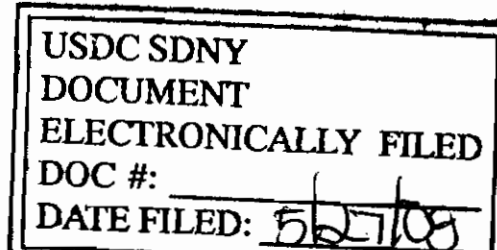
PROPOSED DISCOVERY
PLAN PURSUANT TO
FED. R. CIV. P. 26(f)

FORDHAM AUTO SALES, INC. d/b/a FORDHAM
TOYOTA,

Defendant.
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Pursuant to Fed. R. Civ. P. 26(f), counsel for the parties conferred on May 20, 2008. Based upon that conference, the parties submit this Joint Discovery Plan to the Court:

1. The parties will exchange Initial Disclosures pursuant to Fed. R. Civ. P. 26(a) on or before June 20, 2008.
2. The parties will exchange Initial Interrogatories and Document Requests on or before June 20, 2008.
3. Joinder of additional parties and/or amendment of the pleadings to occur no later than July 31, 2008.
4. Depositions to be completed by October 31, 2008.
5. All discovery, including any expert discovery, to be completed by October 31, 2008.
6. Pursuant to Fed. R. Civ. P. 26(f)(3)(C), (D) & (E), the parties at this time do not anticipate any issues with respect to the disclosure of electronically stored information or claims



of privilege. Furthermore, the parties do not seek any changes in the limitations on discovery imposed by the Federal Rules of Civil Procedure or the Local Civil Rules of this Court.

Dated: New York, New York
May 21, 2008

VLADECK, WALDMAN, ELIAS &
ENGELHARD, P.C.

By: 


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Attorneys for Plaintiff
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McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP

By: 

David J. Reilly (DR 7708)
Attorneys for Defendant
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P.O. Box 2075
Morristown, New Jersey 07962
(973) 993-8100

SO ORDERED:


5-22-08

Secret 7/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CAREER GROUP, INC.

Plaintiff,

- against -

LORI B. ZASLOW, BRYAN J. ZASLOW,
and JONATHAN BETH CONSULTANTS, INC.,

Defendants,

- against -

SUSAN LEVINE,

Counterclaim Defendant.

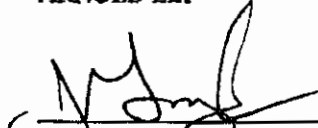
Civil Action No.
06 CV 12951(RWS)

STIPULATION OF
SUBSTITUTION OF COUNSEL
FOR DEFENDANTS


IT IS HEREBY STIPULATED AND AGREED that Defendants substitute Sedgwick,
Detert, Moran & Arnold LLP as its counsel and attorneys of record in this matter, in place and
instead of Robertson, Freilich, Bruno & Cohen, LLC.

Dated: New York, New York
May 16, 2008

SEDGWICK, DETERT, MORAN &
ARNOLD LLP


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
BRYAN J. ZASLOW, on behalf of
all Defendants



SO ORDERED.

Dated:

By:


Hon. Robert W. Sweet
United States District Judge
Southern District of New York